

**REMARKS**

In the January 13, 2006 Office Action, the Examiner noted that claims 1-19 were pending in the application and rejected claims 1-19 under 35 U.S.C. § 102(e) as anticipated by U.S. Patent 5,999,914 to Blinn et al. (Reference A in the January 13, 2006 Office Action). Claims 1-19 remain in the case. The rejections are traversed below.

The Blinn et al. patent is concerned with a sales promotion system incorporated into an electronic commercial-transaction system. A buyer is determined to be a store member if an entry value of the buyer in the "is\_member" field of table V (see columns 20-21) is greater than zero (see, column 22, line 65 to column 23, line 15). Under these conditions, the buyer is assumed to be qualified for participating in a sales promotion campaign scheme, such as "with the purchase of every hat, get an umbrella at half-price" (column 3, lines 5-6). In the system disclosed in Blinn et al., a store is the provider of sales promotion offers.

In rejecting the claims, Blinn et al. was cited as disclosing membership qualification tables including qualification criterion information for qualifying membership of a corresponding service and defining a prescribed service of which a user ought to be a member to have a membership qualification for the corresponding service, and identification information of a first service of the plurality of services being included by qualification criterion information for qualifying membership of a second service of the plurality of services for indicating the prescribed service (claim 4, lines 4-9) for "independent services provided by a plurality of respective different organizations" (claim 4, line 3). As discussed above, Blinn et al. only discloses a single service provider, i.e., a store, and thus, does not teach or suggest membership qualification for one service by being a member of another, independent, service.

On page 3 of the January 13, 2006 Office Action, it was asserted that column 22, line 65 to column 23, line 15 and Figs. 16 and 17 disclosed the limitations quoted above from claim 4. However, the cited text in Blinn et al. only requires membership at the store. Membership at the store does not provide "qualifying membership of a **second service of the plurality of services**" (claim 4, lines 8-9), store membership merely permits the user to obtain the sales promotion. There is no "plurality of services" of which a user can be a member which includes membership at the store.

In other words, there is no suggestion in Blinn et al. of membership qualifying examinations, which commercial organizations offering services directed to members of these respective organizations have to conduct respectively become unnecessary to some extent, while subject to certain limitations, as defined in the claims. For the above reasons, it is

submitted that claim 4, the claims that recite similar limitations and the claims that depend therefrom, patentably distinguish over Blinn et al.

Furthermore, claim 6 recites "a simulating device comparing each membership condition of the service tables of the existing services with the new membership condition" (claim 6, lines 7-8). In rejecting claim 6, it was asserted that column 18, lines 27-48, combined with column 22, line 65 to column 23, line 15, of Blinn et al. disclosed this limitation. However, nothing has been found at column 18, lines 27-48, or anywhere else in Blinn et al., relating to the function of simulating a number of buyers who are expected to become new members. Therefore, it is submitted that claim 6 and claim 7 which depends therefrom, further patentably distinguish over Blinn et al.

### Summary

It is submitted that Blinn et al. does not teach or suggest the features of the present claimed invention. Thus, it is submitted that claims 1-19 are in a condition suitable for allowance. Reconsideration of the claims and an early Notice of Allowance are earnestly solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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